

## **Session One: Summary of the Consolidated Planning Focus Group Discussion**

Session One allowed participants to comment and make recommendations on the Consolidated Planning process. This summary highlights the key points made by the group with some additional participants' comments, suggestions, and recommendations.

- 1) The Con Plan should be an application, not a planning document**
  - a) Overwhelmingly, participants felt that the Consolidated Plan is really a HUD application and not a planning document. Therefore, the focus should be on reducing and simplifying the document.
  - b) Participants believe that the Con Plan should be primarily a HUD application because most grantees have other comprehensive, long term planning mechanisms besides the Con Plan.
  - c) The Con Plan cannot be "all things to all people." Because of the various audiences (from the public, to HUD, to Congress, etc.), the Con Plan has too much information. To appease all interested parties, the grantee ends up listing all possible activities that they may or may not undertake during the Con Plan period.
  
- 2) The Con Plan needs to be streamlined and easier for the public to read**
  - a) A more concise and structured Con Plan document would be more understandable to the public and useful to decision makers in the community.
  - b) The Con Plan is too confusing and long for the public. It should be more useful and user-friendly. Most grantees said that "no one reads it" although some grantees said that they do receive requests for copies of the Con Plan.
  - c) The Con Plan is not useful for the day-to-day management of the grantee.
  - d) There is too much duplication, inconsistency and paper work between Consolidated Plan, Annual Plan, CAPER and IDIS
  - e) The extra narrative is redundant or unnecessary, participants suggested:
    - i) Eliminating the Anti-Poverty Strategy narrative
    - ii) Eliminating the Lead Based Paint narrative
    - iii) Eliminating the Barriers to Affordable Housing narrative
    - iv) Eliminating or more clearly defining certifications of consistency
  - f) The Con Plan process does not take into account the distinction between small cities, large cities, consortia, counties and states. The Con Plan process should allow for modifications to the requirements to meet the needs of these various entities.
  - g) The State emphasized the need for different Con Plan process reporting requirements. For the State, the Con Plan's primary audience is potential eligible grantees. In the Action Plan, the State describes their method of

distribution. These and other major distinctions necessitate different reporting requirements for the State.

- h) Participants suggested that grantees have the option to include charts, templates, GIS maps, and checklists rather than tedious narrative writing in the Con Plan.
- i) Although the Action Plan is the most concise of the three required documents, even the Action Plan could be streamlined. It should be no more than a 10-page document with very little narrative and a checklist or Excel spreadsheet of proposed projects.

**3) The Con Plan, Action Plan and CAPER should include basic information about the community, how it plans to spend HUD funds, and its goals and accomplishments.**

- a) The Con Plan process should be seamless from initial planning, to annual actions, to accomplishments, and financial reporting.
- b) The Action Plan and CAPER should ask for the same information, so grantees know what information to gather over the course of the year.
- c) Con Plan
  - i) A suggestion is to have a 10 year Con Plan (to coincide with the U.S. Census data) with an opportunity to revise at 5 years
  - ii) Describe needs, 2-5 pages, in the words of the community
  - iii) List priorities and strategies, set by the community, with realistic goals
  - iv) Certifications
- d) Action Plan
  - i) Serves as an application and budget
  - ii) Narrative or Excel spreadsheet on current projects only and should include goals
  - iii) Describe any changes from the Con Plan
- e) CAPER
  - i) This is a reporting document
  - ii) Information requested should relate back to the 10-year Con Plan and Annual Action Plan
  - iii) It should illustrate what was accomplished by activity type. For example, housing assistance would be reported by new construction, rehabilitation, mortgage assistance, etc.
  - iv) Better integrate this document with IDIS

**4) In the Con Plan and Action Plan, grantees should report only on HUD funding resources**

- a) It is difficult to identify all resources that will be used because a grantee may not be able to predict all of the resources. A suggestion is that in the Con Plan and Action Plan, grantees should just report on activities that use HUD funding in all or in part.
- b) In the CAPER (not the Con Plan or Action Plan), grantees may want to report on other funding resources to show leveraged and match funds and to report on all of their housing and community development

accomplishments. Participants clarified that if there is a relatively small amount of HUD funds in a project, the HUD funds does not “leverage” other funding. Instead, the HUD funding is more similar to “gap financing.

**5) The Con Plan, Action Plan and CAPER takes up too much staff resources**

- a) The Con Plan, Action Plan, and CAPER reporting requirements are too much of a burden for the grantee and takes up too much staff time and resources. The amount of HUD funding is often very little compared to other funding sources, yet the reporting requirements take up a great deal of staff time.
- b) The extensive reporting requirements take away from staff time for program management and oversight. The burdensome reporting requirements may even affect staff retention for grantees.
- c) HUD should consider increasing the administration cap so that more funds are available to pay for staff time for reporting requirements.
- d) The reporting requirements are a burden especially for small cities with very few staff.
- e) HUD may want to consider a bi-annual reporting cycle for the Action Plan. However, some participants felt that it is too difficult to predict activities for one year, and two years may be even more difficult.

**6) The Con Plan asks for too much unnecessary, outdated, and inaccurate data**

- a) The Con Plan should require basic, standard, up-to-date housing and community development data on grantee’s communities from reliable data resources.
- b) HUD should create methods to make it easier for grantees to gather, analyze, and provide data in the Con Plan, Action Plan, and CAPER. For example, HUD could create forms that the grantees would fill-in the blanks with key U.S. Census Data on housing and community development
- c) The Con Plan cycle does not coincide with the U.S. Census 10 year period. A suggestion is to put the schedule of the Con Plan with the release of census data, every ten years with an opportunity for updating every 5 years. However, some participants felt that a ten year period may be too long and it would become too difficult to predict needs and goals.
- d) The Con Plan, Action Plan, and CAPER reporting requirements are not adequately linked with IDIS. When revising the Con Plan, HUD should coordinate the Con Plan with the CAPER/IDIS reporting requirements.
- e) Data becomes outdated quickly; create a process that allows for up-to-date standard data sets (produced more frequently than the U.S. Census Data) to be provided to every agency. American Community Survey is one possible data source that could be used.
- f) HUD should reconsider developing independent systems that create problems with consistency. Grantees are constrained by HUD programs

such as Community 2020 and IDIS. HUD should use standard software programs that are flexible and compatible with other off-the-shelf software.

- i) Instead of Community 2020 – use ArcView or another standard product
- ii) Instead of IDIS – use software that is compatible with Excel Spreadsheets and Microsoft Word to easily download and manipulate data for other reporting requirements.
- g) It is often difficult to obtain data from different partners to complete the Con Plan, Action Plan and CAPER. Data from different city agencies does not always coincide and it is like comparing “apples” to “oranges.”
- h) Consolidated Planning is very difficult for HOME Consortia; gathering and analyzing data for Consortia is difficult because some cities in the county are in the Consortia, some are not.
- i) Data is often duplicated or miscounted when looking at countywide data, city data, and consortia data (e.g. accurate homeless data is difficult to obtain).

**7) The Con Plan serves a purpose and can be useful**

- a) The primary purpose of the Con Plan is to describe the grantees’ goals, objectives and accomplishments
- b) The Con Plan makes the grantee look at “the big picture” and relate how the jurisdiction will spend federal and other funds.
- c) Consultations can be difficult when some agencies do not understand housing development. However, most participants felt that the consultations are useful because agencies communicate and coordinate with other agencies that they would not otherwise have contacted.
- d) Participants feel that citizen participation is a good practice, and it is good to engage the public, especially low-income persons, in the planning process.
- e) It is useful to have HUD review the reporting documents to check for project eligibility and National Objective.
- f) HUD needs to be able to know how grantees are spending their funds
- g) HUD needs to be able to justify their programs to Congress, the public, etc.